



FEDERAL I.D. NO. 16-0764720

NIXON PEABODY  
ATTORNEYS AT LAW  
[NIXONPEABODY.COM](http://NIXONPEABODY.COM)  
@NIXONPEABODYLLP

Exchange Place  
53 State Street  
Boston, MA 02109-2835  
TEL: (617) 345-1000  
FAX: (617) 345-1300

Anne Bourdine  
State Street Bank and Trust Company  
State Street Financial Center  
One Lincoln Street  
Boston, MA 02111-2900

October 27, 2020  
Invoice No. 10226857  
Account: 809184  
Connolly, Sarah  
Terms: Due Upon Receipt

---

**FOR PROFESSIONAL SERVICES RENDERED through September 30, 2020, including:**

---

**MATTER NO.: 000077 KSENIЯ SHNYRA**

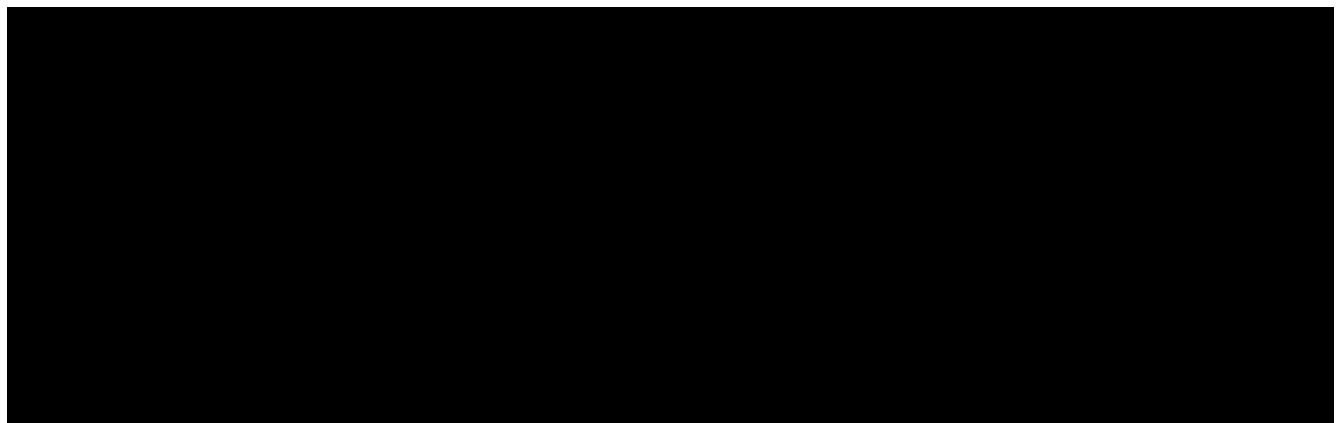
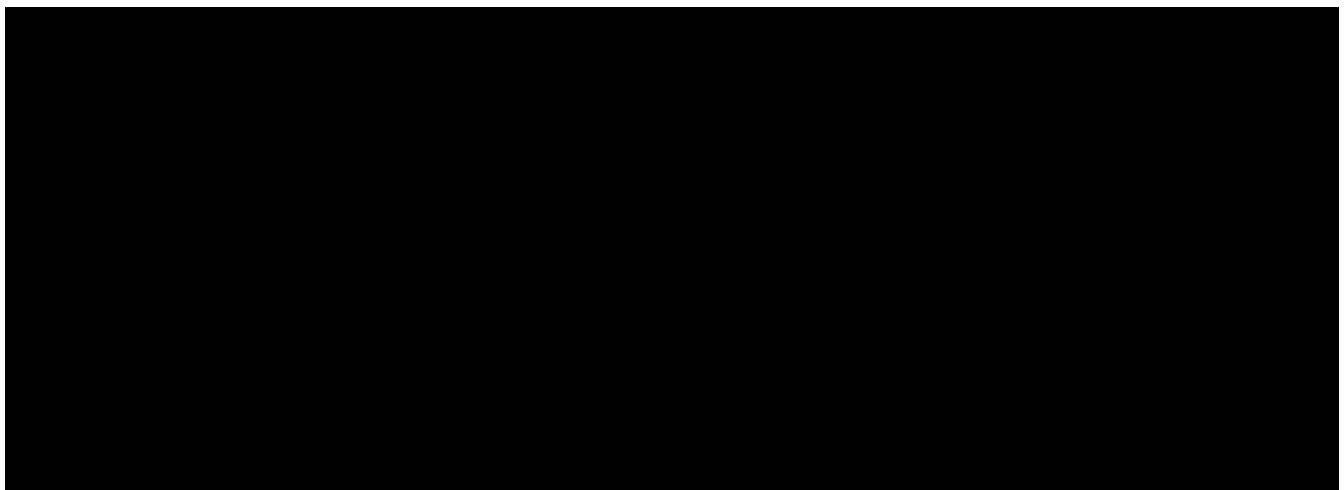
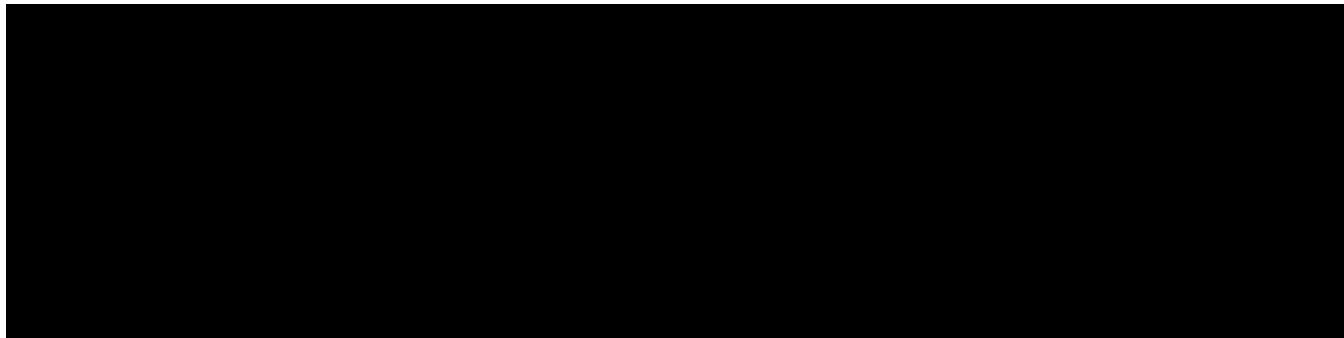
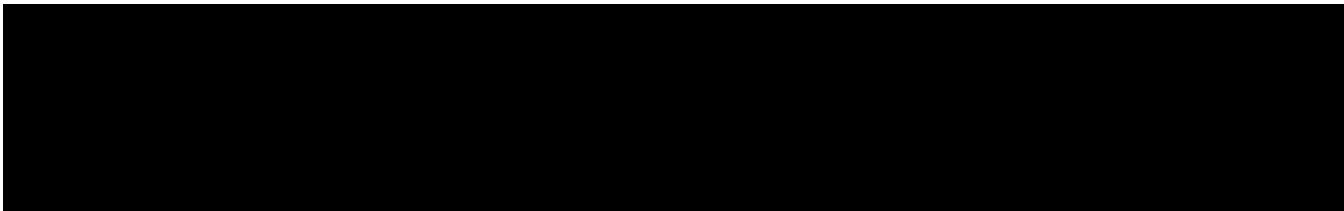
**Client Reference: 2018-11707**

**For Professional Fees:**

Date	Timekeeper	Hours	Description of Services
------	------------	-------	-------------------------

Date	Timekeeper	Hours	Description of Services

Nixon Peabody LLP  
Invoice # 10226857 Page 2



[REDACTED]

09/21/20 D. Tauster 0.30 Exchange correspondence with M. Ratner regarding the discovery demands and responses.

[REDACTED]

09/22/20 D. Tauster 0.30 Exchange correspondence with M. Ratner regarding the outstanding discovery.

[REDACTED]

09/22/20 D. Tauster 0.30 Preliminary review and analysis of K. Shnyra's written document responses.

09/23/20 D. Tauster 0.30 Exchange correspondence with M. Ratner regarding outstanding discovery.

[REDACTED]

09/24/20 D. Tauster 0.30 Exchange correspondence with M. Ratner regarding the outstanding discovery.

09/25/20 D. Tauster 0.10 Review and analyze correspondence from M. Ratner regarding the outstanding discovery.

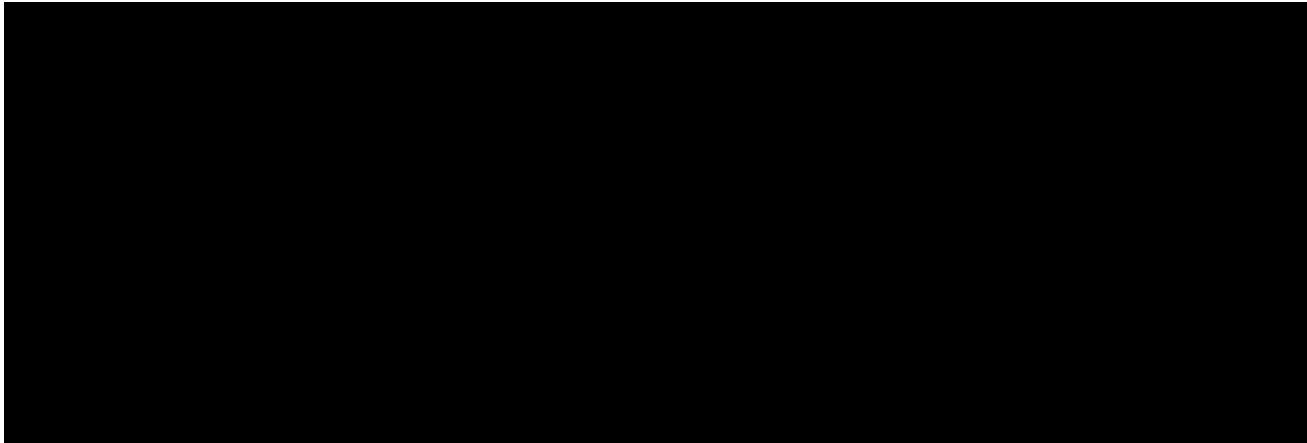
09/25/20 D. Tauster 1.30 Preliminary review and analysis of the initial document production from K. Shnyra and A. Reyngold.

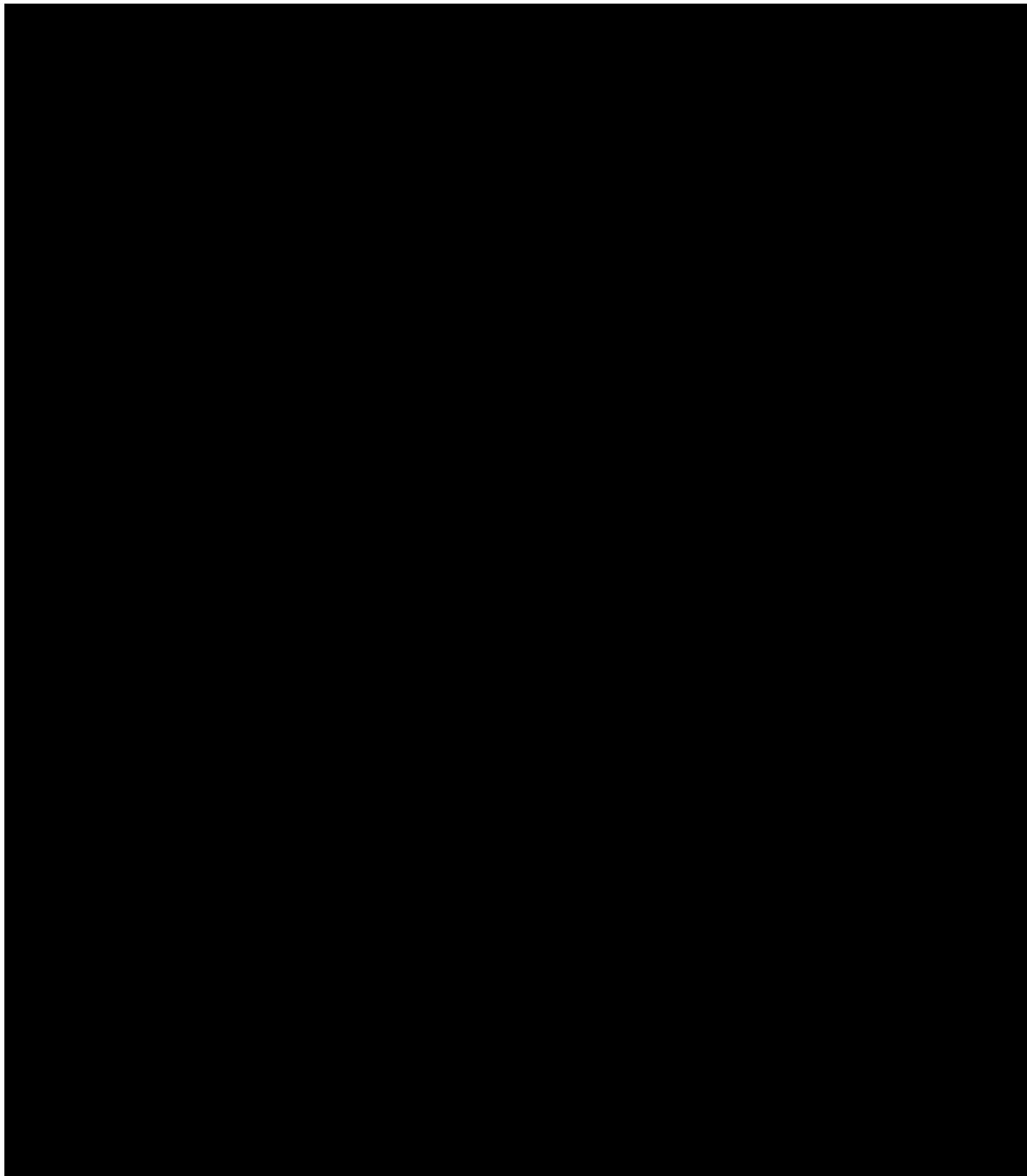
09/28/20 D. Tauster 0.20 Draft correspondence to M. Ratner regarding the outstanding discovery.

09/30/20 D. Tauster 0.10 Review and analyze correspondence from M. Ratner regarding the outstanding discovery.

[REDACTED]

Nixon Peabody LLP  
Invoice # 10226857 Page 4







**FEDERAL I.D. NO. 16-0764720**  
**NIXON PEABODY**  
 ATTORNEYS AT LAW  
**NIXONPEABODY.COM**  
 @NIXONPEABODYLLP  
 Exchange Place  
 53 State Street  
 Boston, MA 02109-2835  
 TEL: (617) 345-1000  
 FAX: (617) 345-1300

Anne Bourdine  
 State Street Bank and Trust Company  
 State Street Financial Center  
 One Lincoln Street  
 Boston, MA 02111-2900

November 19, 2020  
 Invoice No. 10237296  
 Account: 809184  
 Connolly, Sarah  
 Terms: Due Upon Receipt

**FOR PROFESSIONAL SERVICES RENDERED through October 31, 2020, including:**

**MATTER NO.: 000077 KSEНИЯ SHNYRA**

**Client Reference: 2018-11707**

**For Professional Fees:**

Date	Timekeeper	Hours	Description of Services
10/09/20	D. Rosenthal	0.30	Review letter. Confer with D. Tauster regarding same.
10/14/20	D. Rosenthal	1.30	Prepare for and attend court conference. E-mails with D. Tauster and C. Powell regarding same.
10/15/20	D. Rosenthal	0.20	E-mails with D. Tauster.
10/16/20	D. Rosenthal	0.60	Confer with D. Tauster and C. Powell regarding strategy and next steps on motion for sanctions and to compel.

Nixon Peabody LLP  
Invoice # 10237296 Page 2

10/21/20 D. Rosenthal 2.00 Read and revise Declaration and Motion for Sanctions. E-mails with D. Tauster regarding same.

[REDACTED]

10/29/20 D. Rosenthal 0.30 E-mails regarding Ratner filing. Review court order.

10/30/20 D. Rosenthal 0.50 Review filing by Ratner. E-mails regarding same.

[REDACTED]

10/21/20 G. Rosner 1.10 Review, organize and file Notice of Motion for Sanctions and or to Compel with 37 exhibits.

[REDACTED]

[REDACTED]

10/13/20 D. Rosenthal 0.20 Confer with D. Tauster.

10/13/20 D. Tauster 0.20 Review and analyze the order granting a pre-motion conference on the motion for sanctions. Confer with D. Rosenthal regarding same.

Nixon Peabody LLP  
 Invoice # 10237296 Page 3

10/14/20	D. Tauster	2.50	Review and analyze the declaration of K. Shnyra submitted in advance of the sanctions motion conference. Prepare arguments and outline for the conference. Confer with D. Rosenthal regarding same. Appear at the sanctions conference before Judge Woods. Correspondence with C. Powell regarding same.
----------	------------	------	--

10/15/20	D. Tauster	2.40	Draft the declaration of D. Tauster in support of the motion for sanctions, including review and analysis of prior correspondence among counsel and other related documents.
10/16/20	D. Tauster	0.80	Meeting with C. Powell regarding the sanctions motion. Confer with D. Rosenthal.
10/16/20	D. Tauster	3.10	Continue drafting the declaration in support of the motion for sanctions.
10/18/20	D. Tauster	4.00	Begin drafting the memorandum of law in support of the sanctions motion, including review and analysis of relevant case law in connection with same.
10/19/20	D. Tauster	5.40	Continue drafting the memorandum of law in support of the motion for sanctions.
10/20/20	D. Rosenthal	0.30	Confer with D. Tauster regarding motion.
10/20/20	D. Tauster	3.70	Continue drafting the declaration and memorandum of law in support of the sanctions motion. Review and analyze case law in support of same. Confer with D. Rosenthal regarding same.
10/21/20	D. Tauster	3.80	Revise the memorandum of law. Confer with D. Rosenthal regarding same. Draft the notice of motion. Draft correspondence to C. Powell regarding the motion.
10/27/20	D. Tauster	0.60	Telephone call with M. Ratner regarding the sanctions motion and possible settlement. Exchange correspondence with C. Powell regarding same.
10/29/20	D. Tauster	0.40	Exchange correspondence with C. Powell regarding the lack of an opposition to the sanctions motion. Confer with D. Rosenthal regarding same.

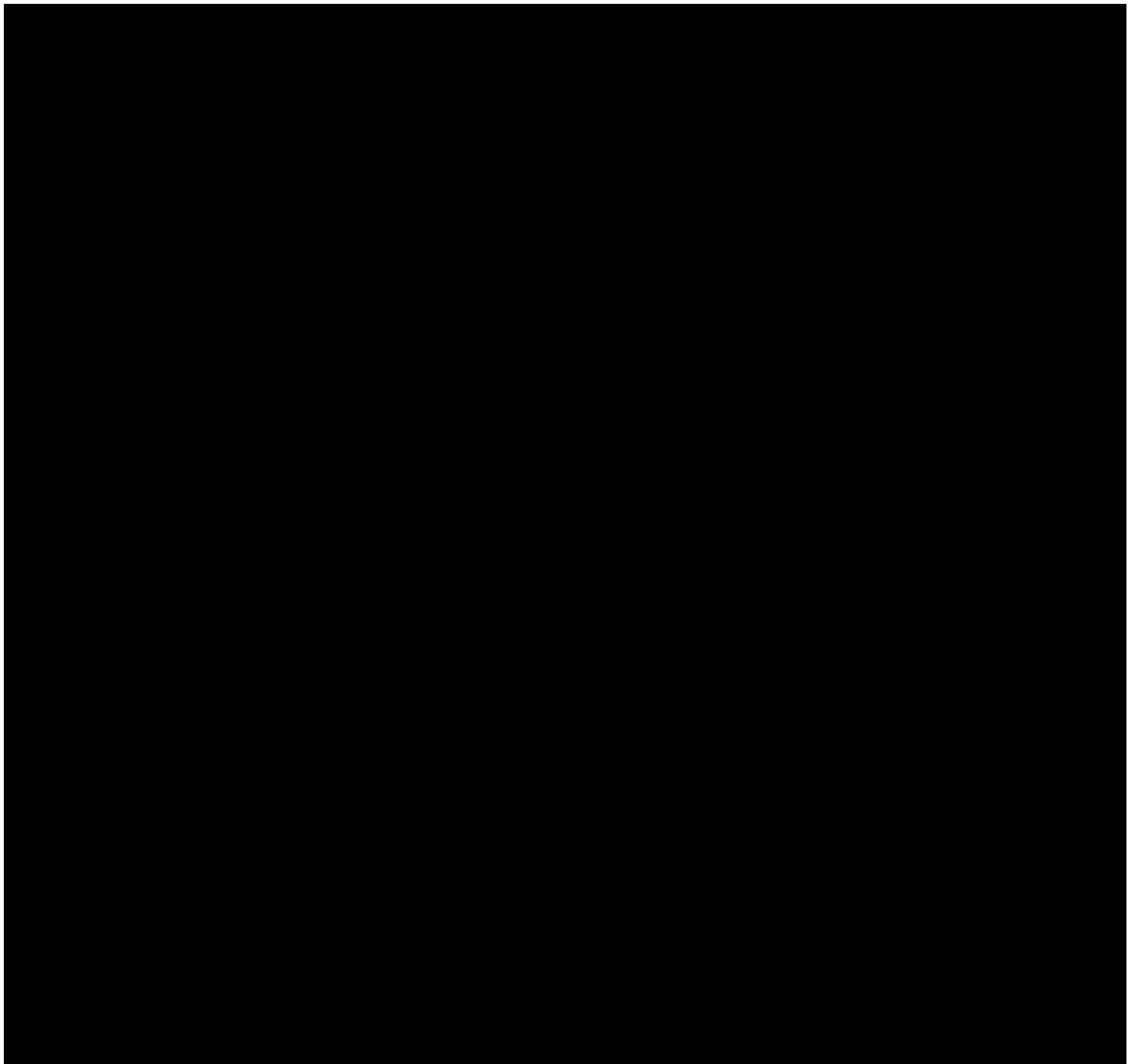
Nixon Peabody LLP  
Invoice # 10237296 Page 4

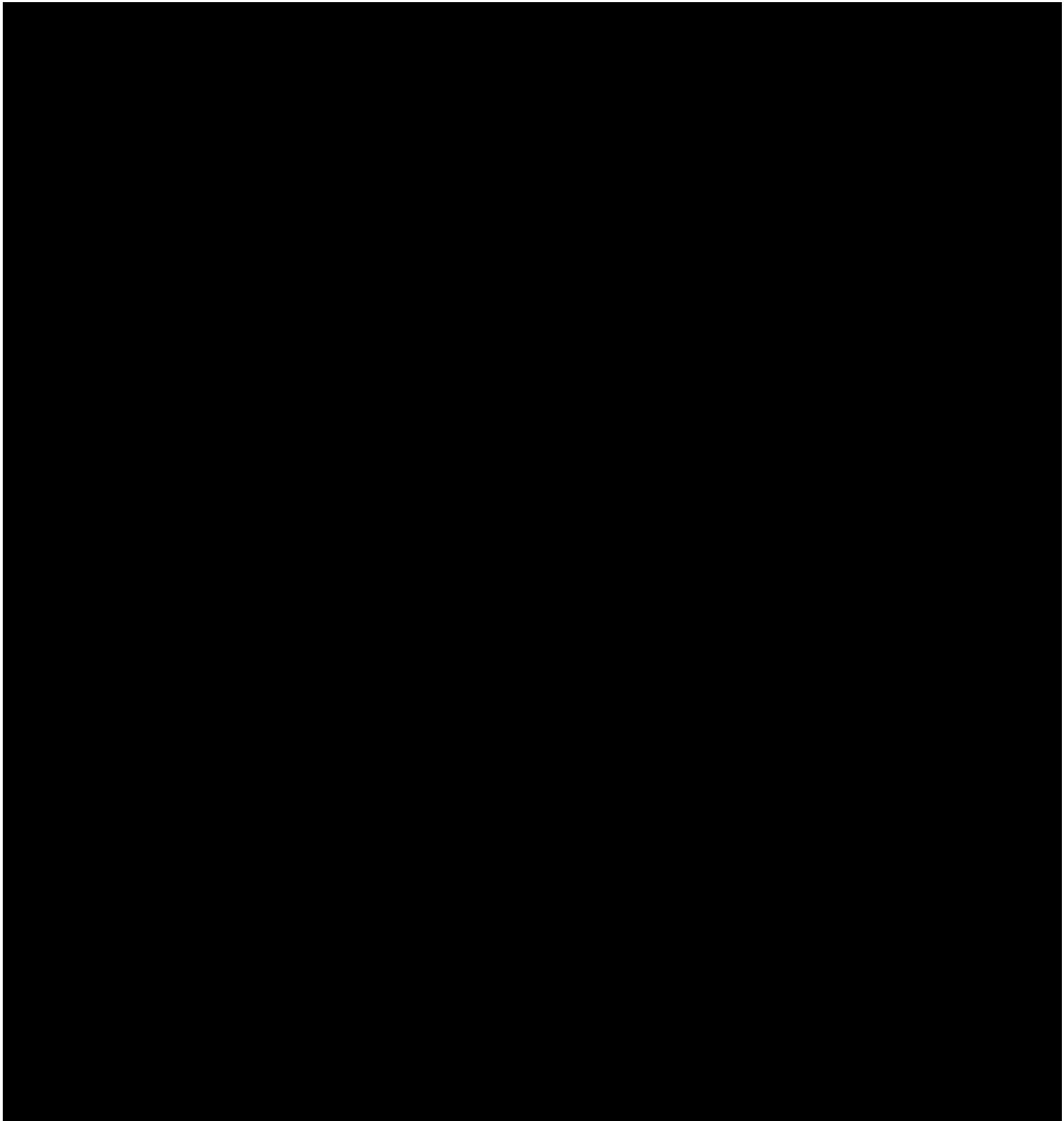
10/29/20	D. Tauster	0.20	Review and analyze the order regarding Plaintiffs' failure to file a response to the sanctions motion. Confer with D. Rosenthal regarding same.
10/30/20	D. Tauster	0.50	Preliminary review and analysis of Plaintiffs' opposition to the motion for sanctions. Exchange correspondence with C. Powell regarding same.

10/01/20	D. Tauster	0.20	Preliminary review and analysis of the K. Walker document production.
----------	------------	------	---

10/01/20	D. Tauster	0.30	Review and analyze correspondence from M. Ratner regarding the status of the outstanding discovery.
10/05/20	D. Tauster	0.10	Draft correspondence to M. Ratner regarding the outstanding discovery.
10/06/20	D. Tauster	0.40	Draft correspondence to M. Ratner regarding the outstanding discovery. Confer with D. Rosenthal regarding same.
10/08/20	D. Tauster	1.50	Draft the pre-motion letter regarding the proposed motion for discovery sanctions.
10/08/20	D. Tauster	0.50	Review and analyze correspondence from M. Ratner regarding the status of discovery. Confer with D. Rosenthal regarding same.
10/09/20	D. Tauster	0.70	Continue drafting the letter requesting a pre-motion conference for a motion for sanctions. Confer with D. Rosenthal regarding same.

Nixon Peabody LLP  
Invoice # 10237296 Page 5







NIXON PEABODY  
ATTORNEYS AT LAW  
[NIXONPEABODY.COM](http://NIXONPEABODY.COM)  
@NIXONPEABODYLLP

FEDERAL I.D. NO. 16-0764720

Exchange Place  
53 State Street  
Boston, MA 02109-2835  
TEL: (617) 345-1000  
FAX: (617) 345-1300

Anne Bourdine  
State Street Bank and Trust Company  
State Street Financial Center  
One Lincoln Street  
Boston, MA 02111-2900

December 4, 2020  
Invoice No. 10241463  
Account: 809184  
Connolly, Sarah  
Terms: Due Upon Receipt

**FOR PROFESSIONAL SERVICES RENDERED through November 30, 2020, including:**

**MATTER NO.: 000077**

**KSEНИЯ SHNYRA**

**Client Reference: 2018-11707**

**For Professional Fees:**

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description of Services</u>
11/01/20	D. Tauster	5.10	Draft the reply memorandum of law in response to the motion for sanctions.
11/02/20	D. Rosenthal	1.70	Read and revise draft reply brief. Confer with D. Tauster and C. Powell regarding same.
11/02/20	D. Tauster	0.10	Confer with D. Rosenthal regarding the opposition to the sanctions motion and our response to same.
11/02/20	D. Tauster	0.50	Continue drafting the reply brief for the sanctions motion.
11/02/20	D. Tauster	0.80	Revise the reply memorandum of law for the sanctions motion per comments from D. Rosenthal.
11/03/20	D. Rosenthal	2.00	Read and revise draft brief. E-mails with D. Tauster regarding same.
11/04/20	D. Rosenthal	1.00	Read and review revised brief. Provide comments. E-mails with D. Tauster regarding same.
11/04/20	D. Tauster	2.50	Exchange correspondence and documentation with C. Powell regarding the reply to the sanctions motion. Confer

Nixon Peabody LLP  
Invoice # 10241463 Page 2

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description of Services</u>
11/04/20	G. Rosner	0.40	with D. Rosenthal regarding same. Final revisions to the reply memorandum of law based on comment received. Review, finalize and file Reply Memorandum of Law in Further Support of Defendant's Motion for Sanctions or Compel.
11/10/20	D. Tauster	0.50	Review and analyze correspondence and documentation from M. Ratner regarding Plaintiffs' interrogatory responses.
11/13/20	D. Tauster	0.40	Confer with M. Caputo and D. Rosenthal regarding the status of discovery received from Plaintiffs.

Nixon Peabody LLP  
 Invoice # 10241463 Page 3

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description of Services</u>
11/16/20	D. Rosenthal	0.70	Review court notice. Confer with D. Tauster and M. Caputo. Begin to prepare for Friday hearing.
11/16/20	M. Caputo	0.50	Review and analyze motion for sanctions, plaintiffs' opposition, and client's reply in preparation for hearing regarding same.
11/18/20	D. Rosenthal	2.60	Prepare for argument on Motion for Sanctions.
11/18/20	M. Caputo	0.70	Review and analyze correspondence with plaintiffs' counsel regarding discovery obligations. Conduct legal research regarding waiver of discovery objections in connection with sanctions hearing.
11/19/20	D. Rosenthal	1.50	Continued preparation for argument. Review court order and e-mails regarding same.
11/19/20	M. Caputo	1.70	Review and analyze plaintiffs' responses to client's discovery requests, and draft memorandum regarding same in preparation for sanctions hearing. Review and analyze court order regarding sanctions hearing, and correspond with client regarding same.
11/25/20	M. Caputo	0.50	Review and analyze invoices involving work related to motion for sanctions. Review and analyze court's 11/24/20 order regarding case status conference. Correspond with plaintiffs' counsel regarding discovery issues.
11/30/20	D. Rosenthal	1.80	Review decision on sanctions motion. Prepare for conference on Wednesday.

Nixon Peabody LLP  
Invoice # 10241463 Page 4

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description of Services</u>
11/30/20	M. Caputo	0.40	Correspond with M. Ratner regarding outstanding discovery issues. Review and analyze Plaintiffs' discovery responses in preparation for meet and confer with plaintiffs' counsel.

